

## **EXHIBIT 16**

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Attorneys for Defendants FEDERAL INSURANCE  
COMPANY and CHUBB & SON INC.

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION**

ANGELICA JONES,  
Plaintiffs,

v.

FEDERAL INSURANCE COMPANY, a New  
Jersey corporation, CHUBB & SON INC.  
(incorrectly referred to as "a Division of Federal  
Insurance Company") a New Jersey corporation,  
and DOES 1 through 20, inclusive,

Defendants.

Case No. 3:14-cv-00313-RS  
Judge: Hon. Richard Seeborg

**DECLARATION OF DOUGLAS A.  
NORDSTROM IN SUPPORT OF  
DEFENDANT CHUBB & SON INC.'S  
NOTICE OF MOTION AND MOTION TO  
DISMISS PLAINTIFF'S COMPLAINT**

Fed. Rule Civ. Proc. 12(b)(6)

**Hearing Date: March 6, 2014**  
**Hearing Time: 1:30 p.m.**  
**Courtroom: 3**

[Filed concurrently with Notice of Motion and  
Motion; Memorandum of Points and  
Authorities in Support Thereof; and [Proposed]  
Order]

I, Douglas A. Nordstrom, declare as follows:

1. I am over the age of 18 and have personal knowledge regarding the matters set forth in this Declaration and, if called upon as a witness, would competently testify as to the facts set forth herein.

DECLARATION OF DOUGLAS A. NORDSTROM IN SUPPORT OF DEFENDANT  
CHUBB & SON INC.'S NOTICE OF MOTION AND MOTION TO DISMISS

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Attorneys for Defendants FEDERAL INSURANCE COMPANY  
 and CHUBB & SON INC.

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA – OAKLAND DIVISION**

ANGELICA JONES,

Plaintiffs,

v.

FEDERAL INSURANCE COMPANY, a New  
 Jersey corporation, CHUBB & SON, INC. (a  
 Division of Federal Insurance Company), a New  
 Jersey corporation, and DOES 1 through 20,  
 inclusive,

Defendants.

Case No.:  
 Courtroom:

**DEFENDANTS FEDERAL  
 INSURANCE COMPANY AND  
 CHUBB & SON INC.'S  
 CERTIFICATION OF INTERESTED  
 ENTITIES OR PERSONS**

Pursuant to Civil Local Rule 3-16, the undersigned, counsel of record for defendant  
 Federal Insurance Company and Chubb & Son Inc., certifies that the following listed parties may  
 have a pecuniary interest in the outcome of this case. These representations are made to enable  
 the Court to evaluate possible disqualification or recusal:

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1 Federal Insurance Company is a wholly owned subsidiary of The Chubb Corporation, a  
2 publicly traded company on the New York Stock Exchange.

3 Chubb & Son Inc., which is an improper party in the State Action, is a wholly owned  
4 subsidiary of The Chubb Corporation. It is incorporated under the laws of the state of New  
5 York, and for purposes of diversity jurisdiction, has a principal place of business in New Jersey.  
6 However, while Chubb & Son Inc. exists as a New York corporation, it no longer conducts any  
7 business in any state or jurisdiction, has not had any employees since January 1, 1998, and has  
8 been inactive since January 1, 1998. While it is inactive, Chubb & Son Inc. serves as a holding  
9 company for some subsidiaries.

10  
11 Dated: January 21, 2014

TRESSLER LLP

12  
13 By:



Mary E. McPherson  
Yeun C. Yim

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15 Attorneys for Defendants FEDERAL INSURANCE  
16 COMPANY and CHUBB & SON INC.

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***Angelica Jones v. Federal Ins. Co. et al.***  
 United States District Court, Northern District of California  
 Oakland Division, Case No. TBD  
**Our File No. 2246-754**

I hereby certify that on the date indicated below, I served the foregoing:  
**DEFENDANTS FEDERAL INSURANCE COMPANY AND CHUBB & SON INC.'S**  
**CERTIFICATION OF INTERESTED ENTITIES OR PERSONS** with the Clerk of the  
 Court using the CM/ECF system. Notification of such filing has also been sent to counsel or all  
 represented parties, including the following:

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Attorneys for Plaintiff ANGELICA JONES

☒ **BY MAIL** (Fed.Civ.Pro. Rule 5 and CCP § 1013) - I deposited such envelope(s)  
 for processing in the mailroom in our offices. I am "readily familiar" with the firm's practices of  
 collection and processing correspondence for mailing. It is deposited with the U. S. Postal  
 Service on that same day with postage thereon fully prepaid at Irvine, California, in the ordinary  
 course of business. I am aware that on motion of a party served, service is presumed invalid if  
 postal cancellation date or postage meter date is more than one day after the date of deposit for  
 mailing in affidavit.

Dated: January 21, 2014

\_\_\_\_\_  
 /s/ Johnetta Caldwell  
 Johnetta Caldwell